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[Proposed] Lead Counsel for [Proposed] Lead Plaintiff

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

CITY OF NORTH MIAMI BEACH
POLICE OFFICERS' AND
FIREFIGHTERS' RETIREMENT
PLAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

NATIONAL GENERAL HOLDINGS
CORP., et al.,

Defendants.

Case No. 2:19-cv-06468-AG-KES

CLASS ACTION

THE PENSION FUNDS' NOTICE OF
MOTION AND MOTION FOR
APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD COUNSEL

DATE: October 21, 2019

TIME: 10:00 a.m.

CTRM: 10D

JUDGE: Hon. Andrew J. Guilford

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that on Monday, October 21, 2019, at 10:00 a.m., or
3 as soon thereafter as the matter may be heard by the Honorable Andrew J. Guilford,
4 Courtroom 10D, 411 West 4th Street, Santa Ana, California, 92701-4516, Town of
5 Davie Police Officers Retirement System and Massachusetts Laborers' Pension Fund
6 (the "Pension Funds") will and hereby do move this Court for an order appointing the
7 Pension Funds as Lead Plaintiff and approving their selection of Robbins Geller
8 Rudman & Dowd LLP as Lead Counsel pursuant to the Private Securities Litigation
9 Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4(a)(3)(B).¹ In support of this
10 Motion, the Pension Funds submit the accompanying Memorandum of Law, the
11 Declaration of Tricia L. McCormick, and a [Proposed] Order.

12 DATED: September 23, 2019

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16 s/ Tricia L. McCormick

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[Proposed] Lead Counsel for [Proposed]
Lead Plaintiff

24 ¹ Because the PSLRA permits any "purported class member . . . including any
25 motion by a class member who is not individually named as a plaintiff in the
26 complaint" to file a motion for appointment as lead plaintiff, 15 U.S.C. §78u-
27 4(a)(3)(B)(i), the Pension Funds cannot ascertain whether any other parties will also
28 seek appointment as lead plaintiff until after the deadline expires on September 23,
2019. Accordingly, the Pension Funds' counsel respectfully requests that compliance
with the meet and confer requirements of Local Rule 7-3 be waived due to the fact
that the Pension Funds cannot confer with unknown movants.

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Additional Counsel for [Proposed] Lead
Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 23, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Tricia L. McCormick
TRICIA L. McCORMICK

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Mailing Information for a Case 2:19-cv-06468-AG-KES City of North Miami Beach Police Officers' and Firefighters' Retirement Plan v. National General Holdings Corp. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Brian Edward Cochran**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)